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May 12, 2023

**Via CM/ECF Electronic Filing**

The Hon. Jose R. Almonte, U.S.M.J.  
United States District Court, District of New Jersey Newark  
MLK Jr. Federal Building & U.S. Courthouse  
50 Walnut Street  
Newark, NJ 07102

Re: **Ramapough Mountain Indians, Inc. v. Daniel Thomas**  
**Case No. 21-cv-09649 JXN-JRA**

Dear Judge Almonte:

The undersigned represents Defendant, Daniel Thomas, in connection with the above-referenced matter. Pursuant to the Court's Text Order (ECF #59), please accept this response to the correspondence from Plaintiff's counsel (ECF #57) with respect to Defendant's discovery responses. Due to personal reasons and his schedule, the completion of Defendant's discovery responses have been delayed. Defendant is affiliated with a number of different organizations regarding the advocacy of Native American issues and has been travelling extensively in connection with his role in that area. Further, Defendant recently had a death in his family which has impacted him. Response to the discovery requests have been prepared and we are waiting for the Defendant to return certified responses to us. We expect to have the certified responses to the Interrogatories and Request for Production shortly and will promptly serve same on Plaintiff's counsel.

We thank the Court for its courtesies and consideration.

Respectfully submitted,

LUM, DRASCO & POSITAN

*Kevin J. O'Connor*

KEVIN J. O'CONNOR  
A Member of the Firm



## LUM, DRASCO & POSITAN LLC

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Mr. Daniel Thomas (via email)  
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